

Metal Finishing Strategic Goals Program
REPORT FROM INDIANA'S RCRA WORKGROUP: 5/3/2001

Ad Hoc Workgroup Participants:

The ad hoc RCRA Workgroup met in Indianapolis at IDEM on March 2, 2001 and April 19, 2001. Mark Sutton (HH Sumco), Gary Romesser (IDEM), Dave Berrey (IDEM), Ted Heemstra (Chemical Recovery Systems), Greg Czajkowski (Region 5 EPA), Al Fenedick (Region 5 EPA), and Krista Durlas (Region 5 EPA) participated.

Update on Tasks Assigned to Workgroup (Since Last Meeting in January):

The group has worked on the following assigned tasks:

- C Prepare a **"model variance request"** for SGP companies to use:

On April 17, 2001, the Indianapolis Star public noticed the IDEM's intent to grant HH Sumco's request for an F006 variance. HH Sumco's application and the draft approval are available upon request. At the end of the 30 day comment period, IDEM will evaluate all comments before making a final decision. Some key conditions required in the draft approval are as follows:

- C Minimum metal content of copper, nickel, or tin of 2% dry weight basis, or equivalent precious metal value;
 - C Cyanides must be below 590 ppm;
 - C Routine monitoring and recordkeeping to assure minimum metal content levels and document shipments;
 - C Maintain on file records of contractual arrangements with all receiving facilities;
 - C Maintain documentation to assure that completion of reclamation by the destination facility does occur;
 - C Environmentally sound storage of materials at receiving facilities; no storage on the land;
 - C Notification to receiving countries outside of the United States;
 - C The variance only applies in Indiana.
- C Dave Berrey is preparing a list of procedures for **fast-tracking** reviews of **"variance" and "delisting" requests** at IDEM. Mark Sutton will prepare guidance for SGP participants to use when submitting requests. Mark is also available for questions or assistance if any SGP Company wants to pursue a variance. The procedures and guidance will be reviewed for comment by the workgroup in June and submitted at the next Stakeholder's Meeting.
- C EPA Region 5 is preparing a paper to address **possibilities for Federal rulemaking regarding conditional exemptions for F006 wastes**, particularly those related to **ion exchange canisters** (as was recommended by the Metal Finishing Benchmark Study workgroup). A draft paper will be reviewed for comment by the workgroup in June.
- C Indiana incorporates Federal rule for F006 Recycled Wastes: effective May 4, 2001.
- C Developing a **database of recycling facilities**: No additions/upgrades to report for this Quarter. Ted Heemstra will continue to work with Mark Stoddard to develop a user-friendly list.
- C IDEM provides **RCRA guidance documents** on their website and will have some handouts available at the Stakeholder's meetings (e.g., NPD for F006 Recycled Wastes: Allowing LQGs 180 Days/270 Days Accumulation, RCRA Satellite Accumulation Areas, Changes to Manifest Requirements). IDEM's Information for Business and Industry web page is <http://www.state.in.us/idem/busind.html>.